

*United States Attorney
Southern District of New York*

February 26, 2019

Via ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United State Courthouse
40 Foley Square, Courtroom 1306
New York, New York 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, 18 Cr. 224 (ALC)

Dear Judge Carter:

On February 25, 2019, the defendant filed nine separate pretrial motions. (*See* Dkt. Nos. 81-98). The legal memoranda in support of those motions total approximately 140 pages. The Government's current deadline to file an opposition is March 25, 2019. Given the breadth of the defendant's pretrial motions, the Government respectfully requests until April 26, 2019 to file its opposition. The Government also respectfully requests permission to file an omnibus brief in opposition totaling up to 140 pages. The Government will endeavor to be concise in its opposition and not reach its proposed 140-page limit.

The Government has conferred with defense counsel who does not object to these requests. If the Court grants the Government's request to extend its deadline to file an opposition brief, the parties respectfully request that the defendant's deadline to file any reply be set for May 17, 2019.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

by: /s/
 Andrew DeFilippis / Rebekah Donaleski
 Matthew Laroche
 Assistant United States Attorneys
 Garrett Lynch
 Special Assistant United States Attorney

CC: Defense Counsel (via ECF)